### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE CHATTANOOGA DIVISION

STACY STROBL and BRIAN HARDING,	)	
On behalf of themselves and all others	)	
Similarly situated,	)	
	)	
Plaintiffs,	)	
	)	Case No. 1:24-cv-00140-CLC-CHS
VS.	)	
	)	JURY DEMAND
PAUL CROFT; JONATHAN FROST;	)	
RHINO ONWARD INTERNATIONAL, LLC;	)	
ROI FUND I, LLC; ROI FUND II, LLC;	)	
ROI FUND III, LLC; ROI FUND IV, LLC;	)	
BRIAN KAWAMURA; CROFT & FROST, PLLC;	)	
THE WELL FUND LLC; SCORPIO REF, LLC;	)	
MATTHEW DIRA; THE DIRA GROUP;	)	
CHESTNUT HOLDINGS, LLC; STEVEN FROST;	)	
LISA FROST; JOSEPH INVESTMENTS, LLC;	)	
JANE and JOHN DOES 1-25,	)	
	)	
Defendants.	)	

# STIPLUATION FOR INITIAL EXTENSION OF TIME TO RESPOND TO COMPLAINT FOR DEFENDANT THE WELL FUND LLC

Pursuant to Local Rule 12.1 (a), Plaintiffs Stacy Strobl and Brian Harding, and Defendants The Well Fund, LLC, The Dira Group, Matthrew Dira, Steven Frost, Lisa Frost and Joseph Investments, LLC hereby stipulate that The Well Fund LLC's time to file a responsive pleading in this action pursuant to Rule 12 shall be extended for twenty-one (21) days. The current deadline is May 14, 2024, so the extension shall make Defendant The Well Fund's responsive pleading due June 4, 2024.

#### Respectfully submitted,

/s/ Alyson S. Beridon (signed with permission)
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#### s/ J. Michael Holloway

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## /s/ Kimberly M. Ingram-Hogan (signed with permission

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Attorneys for Defendants Steven Frost, Lisa Frost and Joseph Investments, LLC

#### **CERTIFICATE OF SERVICE**

I herby certify that on this the 14th day of May, 2024, the foregoing was filed electronically with the Clerk of Court to be served by operations of the Court's electronic filing system upon the following:

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/s/ J. Michael Holloway
J. Michael Holloway